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and Huamei Consulting Co., Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

HARMONI INTERNATIONAL SPICE,
INC., a California corporation, and
ZHENGZHOU HARMONI SPICE CO.,
LTD., a corporation,

Plaintiff,

v.

WENZUAN BAI, an individual, JICHENG
YE, an individual, RUOPENG WANG, an
individual, ROBERT T. HUME, an
individual, JOEY C. MONTOYA, an
individual, STANLEY CRAWFORD, an
individual, AVRUM KATZ, an individual,
HUAMEI CONSULTING CO., INC., a
corporation, KWO LEE, INC., a California
corporation, SHUZHANG LI, an individual,
C. AGRICULTURE GROUP CORP.,
corporation, HEIBEI GOLDEN BIRD
TRADING CO., LTD., a corporation,
QINGDAO TIAN TAIXING FOODS, CO.,
LTD., a corporation, JINXIANG HEJIA
CO., LTD., a corporation, QINGDAO
LIANGHE INTERNATIONAL TRADING
CO., LTD., a corporation, CHEN
HONGXIA, an individual, JIN XIA WEN,
an individual, MINGJU XU, an individual,
CAI DU, an individual, QINGHUI ZHANG,
an individual, LUCY WANG, an individual,

Defendants.

CASE NO: 2:16-cv-00614

Honorable Beverly Reid O'Connell

**DECLARATION OF JOEY C.
MONTOYA**

DECLARATION OF JOEY C. MONTOYA

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DECLARATION OF JOEY C. MONTOYA

I, Joey C. Montoya, hereby declare and state as follows:

1. I am an attorney duly authorized to practice law before the CIT and the State of New Mexico, and am a party to this action. The facts attested below are known to me of my own personal knowledge and if called upon to testify regarding them, I could and would competently do so.

2. I am a named party in the within action, filed in the United States District Court, Central District of California, although I have absolutely no connection to or contact with the State of California.

3. I am not now, nor have I ever been, licensed to practice law in the State of California, nor have I at any time conducted any business in the State of California.

4. Not only do I lack any business connection with the State of California, but I have no personal contact or connection there. In fact, I have lived in New Mexico the entirety of my life as of the date of this Declaration, and currently reside in Santa Fe, New Mexico.

5. Additionally, the entirety of my education was obtained in the State of New Mexico, including high school, college, and law school – none in California.

6. Upon completing law school (in New Mexico), I became employed by the law firm of Hume & Associates, also located in New Mexico, in or about August 2015. In fact, I had only been employed with Hume & Associates approximately five (5) months prior to the filing of the instant action naming me as a party.

7. At no time have I ever been employed in any capacity within the State of California.


8. I visited California once in my life, in 2008, for three (3) days total during a post-college “road trip” with friends. Those three (3) days are the extent of any contact I have ever had with the State of California.

DECLARATION OF JOEY C. MONTOYA

9. In the course of my employment as an attorney with Hume & Associates, I sometimes executed filings with the Department of Commerce; however, these filings are not filed in the State of California.

I declare, under penalty of perjury under the laws of the State of California and the United States, that the foregoing is true and correct.

Executed this 7th day of March, 2016, at Sante Fe, New Mexico.


Joey C. Montoya

DECLARATION OF JOEY C. MONTOYA